

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

<i>TERESA WOODS and KENNETH SLOAN,</i>)	
)	
Plaintiffs,)	
)	Cause No.: 4:20-cv-01413-HEA
v.)	
)	
<i>RED ROOF INNS, INC.,</i>)	JURY TRIAL DEMANDED
)	
Defendant.)	
)	

JOINT PROPOSED SCHEDULING PLAN

COME NOW the Parties and submit their proposed scheduling plan:

1. The Parties agree **Track 2** is appropriate.
2. Joinder of additional parties or amendment of pleadings: **December 18, 2020.**
3. Discovery Plan:
 - (i) Agreed-upon provisions for disclosure or discovery of electronically stored information: **None.**
 - (ii) Agreements the parties reach for asserting claims of privilege or of protection as trial-preparation material after production: **The Parties agree the provisions of Fed. R. Evid. 502 shall apply.**
 - (iii) A date by which the parties will disclose information and exchange documents pursuant to Fed.R.Civ.P. 26(a)(1): **December 1, 2020**
 - (iv) Whether discovery should be conducted in phases or limited to certain issues: **No, other than what is identified in this Plan.**
 - (v) Dates by which each party shall disclose its expert witnesses:
 - Plaintiffs' Expert Disclosures Due: **March 31, 2021**
 - Plaintiffs' Experts must be deposed: **April 28, 2021**
 - Defendant's Expert Disclosures Due: **May 26, 2021**

- Defendant's Experts must be deposed: **June 30, 2021**
 - (vi) The Parties **agree** the presumptive limits of ten (10) depositions per side as set forth in Fed.R.Civ.P. 30(a)(2)(A), and twenty-five (25) interrogatories per party as set forth in Fed.R.Civ.P. 33(a), should apply in this case.
 - (vii) The Parties **do not** anticipate the need for any physical or mental examinations of parties under Fed.R.Civ.P. 35. If that anticipation changes, the Parties agree to work together to provide mutually acceptable deadlines.
 - (viii) Discovery to be completed: **July 2, 2021**
4. The Parties anticipate referral to mediation would be most appropriate after substantial fact discovery, but before expert discovery. **The Parties request referral to mediation on February 15, 2021, to be completed by March 31, 2021.**
5. Dispositive Motions Due: **July 15, 2021**
6. Earliest date by which this case should reasonably be expected to be ready for trial: **March 2022.**
7. An estimate of the length of time expected to try the case to verdict: **4 days.**

SANSONE & LAUBER

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